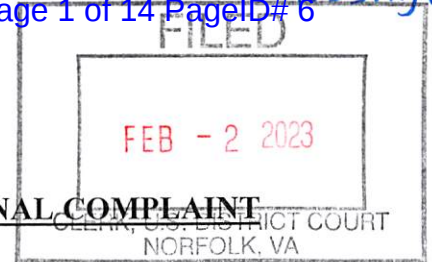


4:23mjll



AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

INTRODUCTION

I, Desirae Maldonado, being duly sworn, hereby depose and state:

1. I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation (FBI). I have been employed by the FBI as a Special Agent since January 2019. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), that is, I am an officer of the United States, who is empowered by law to conduct investigations regarding violations of United States law, to execute warrants issued under the authority of the United States, and to make arrests of the offenses enumerated in 18 U.S.C. §§ 2251 *et. seq.* In the course of my duties, I am responsible for investigating crimes which include, but are not limited to, child exploitation and child pornography. I have previously been involved in criminal investigations concerning violations of federal laws. Since joining the FBI, I have received specialized training in human trafficking investigations, identifying and seizing electronic evidence, computer forensics, recovery, and social media investigations.

2. This affidavit supports an application for a criminal complaint charging **CHRISTOPHER SCOTT JONES** with Coercion and Enticement of a Minor, in violation of Title 18, United States Code, Section 2422(b).

3. The information set forth in this affidavit is known to me as a result of an investigation personally conducted by me and other law enforcement agents. Thus, the statements in this affidavit are based in part on information provided to Special Agents (“SAs”) and other employees of the FBI, as well as other investigators employed by federal or state governments. I

have participated in investigations involving persons who collect and distribute child pornography, and the importation and distribution of materials relating to the sexual exploitation of children. I have received training in the areas of child exploitation, and I have reviewed images and videos of child pornography in a wide variety of media forms, including computer media. I have also discussed and reviewed these materials with other law enforcement officers.

4. In the course of my employment as a sworn law enforcement officer, I have participated in the execution of numerous search warrants resulting in the seizure of computers, magnetic storage media for computers, other electronic media, and other items evidencing violations of state and federal laws, including various sections of Title 18, United States Code § 2251 *et. seq.* involving child exploitation offenses.

5. This affidavit is based upon information that I have gained from my investigation, my training and experience, as well as information gained from conversations with other law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **CHRISTOPHER SCOTT JONES**, has committed a violation of Title 18, United States Code, Section 2422(b).

STATUTORY AUTHORITY

6. This investigation concerns alleged violations of Title 18, United States Code, Section 2422(b), relating to material involving the coercion and enticement of a minor.

7. Title 18, United States Code, Section 2422(b) provides that whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and

territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title or imprisoned not less than 10 years or for life.

DEFINITIONS

8. The terms "minor" and "sexually explicit conduct" are defined in Title 18, United States Code, Sections 2256(1) and (2). The term "minor" is defined as "any person under the age of eighteen years." The term "sexually explicit conduct" means actual or simulated:

- a. Sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex;
- b. Bestiality;
- c. Masturbation;
- d. Sadistic or masochistic abuse; or
- e. Lascivious exhibition of the anus, genitals or pubic area of any person.

9. The term "computer," as used herein, is defined pursuant to Title 18, United States Code, Section 1030(e)(1), as "an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device."

FACTS AND CIRCUMSTANCES

10. On July 15, 2022, Officers with the James City County Police Department (JCCPD) were dispatched to the Velocity Urgent Care located at 4374 New Town Avenue, Williamsburg, Virginia in James City County in reference to an incident involving the organization, Predator Poachers, and **CHRISTOPHER JONES**. The Predator Poachers identified as an organization that tracked people who attempted to meet minors for sexual activity. The caller stated there was a black male in a white truck bearing license plate QSIREN who was at the Velocity Urgent Care to meet with a juvenile for sex. Upon arrival to the scene, JCCPD Officers were met by three members of the Predator Poachers – A.R., J.Z., and P.R. JCCPD Officers spoke with A.R., the Predator Poachers representative, who advised JCCPD Officers **JONES**, a Newport News Firefighter, was present to meet with a 12-year-old female for sexual activity. The 12-year-old female was a fictional juvenile created by the Predator Poachers. **JONES** used Instagram username “ghostflame80” to communicate with fictional juvenile username “emilymangumm”. Instagram username “ghostflame80” had a display name of “Christopher Scott Jones” on the Instagram account. **JONES** also used Telegram to communicate with the fictional juvenile.

11. A.R., J.Z., and P.R. advised JCCPD Officers **JONES** exited the white Dodge Ram truck bearing Virginia license plate QSIREN and entered Velocity Urgent Care to call his wife prior to JCCPD’s arrival. JCCPD Officers located **JONES** locked in a bathroom on the second floor of Velocity Urgent Care.

12. A.R. provided JCCPD Officers with a stack of screenshots of Instagram messages between Instagram username “ghostflame80”, display name “Christopher Scott Jones”, and Instagram username “emilymangumm”. The stack of screenshots also included messages from

Telegram between telephone number 757-561-XXXX and telephone number 832-530-XXXX. On July 16, 2022, JCCPD Officer M.C. Renner entered telephone number 757-561-XXXX into ZetX Carrier Lookup, which yielded the following results: Wireless number – yes, Carrier – Verizon, Associated name – “Jones, Christoph”. JCCPD Officer M.C. Renner also observed telephone number 757-561-XXXX listed on a Facebook account associated with **JONES** as the telephone number for Cutters Lawn Care LLC. **JONES** was listed as the owner-operator of Cutters Lawn Care LLC on said Facebook account. According to A.R., telephone number 832-530-XXXX belonged to A.R.

13. From approximately March 16, 2022, through July 15, 2022, Instagram username “ghostflame80” communicated with Instagram username “emilymangumm”. The following conversation ensued but does not encompass the entirety of the conversation between approximately March 16, 2022, and July 15, 2022:

- a. Emilymangumm: *idk lol ask me when I have one*
- b. Ghostflame80: *Lol*
- c. Ghostflame80: *Well I'm a boy and I'm your friend....sooo*
- d. Emilymangumm: *Yea but ur not my boyfriend*
- e. Emilymangumm: *Unless u meant u are idk*
- f. Ghostflame80: *What? You want me to be?*
- g. Emilymangumm: *Well do u wanna be?*
- h. Ghostflame80: *I asked you first?*
- i. Emilymangumm: *I don't mind*
- j. Emilymangumm: *I'm cool with it*
- k. Ghostflame80: *Are you sure?*
- l. Emilymangumm: *Yea are u*
- m. Ghostflame80: *I'm cool with it*
- n. Emilymangumm: *Okay cool*
- o. Ghostflame80: *So what would you and your BF do?*
- p. Emilymangumm: *so are we bf and gf?*
- q. Ghostflame80: *You said we were*
- r. Emilymangumm: *Well are we*
- s. Ghostflame80: *If you said we were then I guess we are*

- t. Emilymangumm: *Okay*
- u. Emilymangumm: *Well is that what u want too*
- v. Ghostflame80: *Yea. I've never had a GF as young as you though*
- w. [...]
- x. Ghostflame80: *You tell grace about us?*
- y. Emilymangumm: *Nooo*
- z. Emilymangumm: *Should i*
- aa. Ghostflame80: *Nooooo*
- bb. Emilymangumm: *Okay that's what I thought lol*
- cc. Emilymangumm: *Yea I'll never tell*
- dd. Ghostflame80: *Promise?*
- ee. Emilymangumm: *Promise.*
- ff. Emilymangumm: *Do you promise*
- gg. Ghostflame80: *Promise. Why don't you want anyone to know? I'm just curious.*
- hh. Emilymangumm: *Because like I don't wanna get in trouble I think it would get me in trouble*
- ii. Ghostflame80: *Same here*
- jj. Emilymangumm: *But if u want me to tell people I will cause ur my love*
- kk. Ghostflame80: *I think we both would get in trouble. So I think we should keep it between just us. I don't want to lose you.*
- ll. Emilymangumm: *Okay. Same*
- mm. [...]
- nn. Emilymangumm: *Hehe can't wait to see u*
- oo. Ghostflame80: *Really?*
- pp. Emilymangumm: *Yuh**
- qq. Ghostflame80: *I'm very nervous*
- rr. Ghostflame80: *I'm taking a very big risk. I want to see you but I have to know you feel the same. I've heard of people getting caught and getting in trouble doing something like this.*
- ss. Ghostflame80: *There is something you can do to make me not nervous*
- tt. Emilymangumm: *Whaaa*
- uu. Ghostflame80: *I trust you. I really do. I just want to get the nervous out me about coming. I need you to send that selfie that you don't want to send. It will tell me that you are willing to take a big risk like me and that I won't get in trouble. I pinky swear it will be just for me. I know I said I wouldn't ask you again, but I need to know nobody is going to get me in trouble.*
- vv. Ghostflame80: *People send those as well to show that they like the other person a lot and to let them know that they are serious about their relationship and make them feel not so nervous.*
- ww. Ghostflame80: *I'm begging...I want to feel safe*
- xx. [...]
- yy. Emilymangumm: *Hey*

- zz. Emilymangumm: *And I'm not gonna tell anyone.*
- aaa. Emilymangumm: *I promise*
- bbb. Emilymangumm: *I'm just nervous about that selfie*
- ccc. Emilymangumm: *I trust u*
- ddd. Ghostflame80: *I know. But it would make me feel a little more safe knowing you are taking a big chance like me*
- eee. Ghostflame80: *You see..I read that people can imitate people on the internet. So people may not be who they say they are. I believe you are Emily. Though we only talk on the phone a little, we message everyday. But there may be people who are trying to prevent us from talking.*
- fff. Ghostflame80: *Those people can't send selfies like I'm asking from you. So I want to know that you are really who I love. Sending me that selfie will tell me everything I need to know. It's easy and simple. I promise I will delete it after you send it and I'll show you that I deleted it.*
- ggg. Ghostflame80: *I'm so nervous that I may not come. Please help me get over my nervousness so I can come see you*
- hhh. Ghostflame80: *You know you are right. I should trust you. You haven't given me a reason not to trust you. Forget everything I said. I trust you.*
- iii. Ghostflame80: *I shouldn't ask you to do something you're not comfortable with*
- jjj. Ghostflame80: *I'm sorry*
- kkk. Ghostflame80: *Hope you're not mad at me*
- lll. Emilymangumm: *I'm not mad.*
- mmm. Emilymangumm: *And I understand what you're saying I think*
- nnn. Emilymangumm: *But I just trust u*
- ooo. Emilymangumm: *And won't tell anyone*
- ppp. Ghostflame80: *I'm glad you understand and I'm glad you aren't mad*

14. From approximately March 16, 2022, through July 15, 2022, the following conversation occurred on Telegram between telephone number 757-561-XXXX and telephone number 832-530-XXXX. The following conversation ensued but does not encompass the entirety of the conversation between approximately March 16, 2022, and July 15, 2022:

- a. **JONES:** *I want to see if you are ready to explore. If you can show me you are, then it will make me more comfortable when we meet.*
- b. **JONES:** *You trust me right?*
- c. Fictional juvenile: *I do trust u*
- d. **JONES:** *It will also make me more comfortable knowing that you won't tell anyone about us.*
- e. Fictional juvenile: *No never.*

- f. Fictional juvenile: *Never ever never.*
- g. Fictional juvenile: *You're my love.*
- h. **JONES:** *So it's ok to send me one just so I know.*
- i. Fictional juvenile: *And if I send u one what does that mean we'd do In person*
- j. [Fictional juvenile sends photo with torso exposed.]
- k. Fictional juvenile: *Was that good?*
- l. **JONES:** *That was awesome!*
- m. **JONES:** *I like your belly button!!*
- n. **JONES:** *Feel comfortable enough to take more?*
- o. Fictional juvenile: *Ur turn*
- p. Fictional juvenile: *How else would we explore hehe*
- q. **JONES:** *Well maybe I could run your stomach a little...maybe kiss your stomach too...maybe kiss down to your underwear. But I don't know what's past that. Want to show me?*

15. A.R. informed JCCPD Officers **JONES** was under the impression he would be meeting the fictional juvenile on her twelfth birthday at Newtown Point Apartments, Apartment #XXXX in Williamsburg, Virginia to have sex with her. **JONES** believed the fictional juvenile's mother was not going to be home. A.R., J.Z., and P.R. confronted **JONES** at the apartment when **JONES** arrived. **JONES** wanted to discuss the incident in private, to which A.R., J.Z., and P.R. asked if they could join **JONES** in his vehicle to discuss. **JONES** agreed. A.R., J.Z., P.R., and **JONES** traveled to several different parks in the area to discuss the matter until later arriving at Velocity Urgent Care located on New Town Avenue in Williamsburg, Virginia. A.R. informed JCCPD Officers their confrontation was recorded on camera and was live-streamed. A.R. provided JCCPD Officers with the digital media for said recordings.

16. On July 15, 2022, JCCPD Senior Police Officer D.T. Frick obtained a search warrant from the Commonwealth of Virginia Magistrate Zachary R. Allentuck for a 2013 White Ram Truck (VIN: 3C63RRML9DG608586) bearing Virginia license plate QSIREN registered to **CHRISTOPHER SCOTT JONES** with an address of XXX Quarter Trail, Apartment X, Newport

News, Virginia 23608. The vehicle was parked at or near XXXX New Town Avenue, Williamsburg, Virginia 23188. The search warrant obtained was executed on July 15, 2022. JCCPD seized a CVS Pharmacy shopping bag, contact solution in a box, Listerine strips and packaging, and a CVS Pharmacy paper receipt. The CVS Pharmacy paper receipt listed three items: OPTFR PRMST MP 2PK 1oz., ASTRGL DMND X GEL 3Z, and LSTRN CM STRPS 3PK 72CT. Although the “ASTRGL DMND X GEL 3Z” was not found in the vehicle, JCCPD Officers determined “ASTRGL DMND X GEL 3Z” was a three-ounce bottle of AstroGlide, a premium silicone gel, personal lubricant, that was found on a CVS Pharmacy shelf listed as “ASTRGL DMND X GEL 3Z”. The AstroGlide bottle that matched the description listed on the CVS Pharmacy paper receipt was described as a personal lubricant that was extremely long-lasting, hypoallergenic, condom compatible, no drip, and waterproof.

17. On July 15, 2022, JCCPD Sergeant S. Perry asked **JONES** if he knew why JCCPD was at the scene. **JONES** replied “Of course I do.” JCCPD Sergeant S. Perry asked **JONES** “What’s that?” **JONES** replied, “Oh some stupid shit that I got myself into.”

18. On July 15, 2022, JCCPD Investigator L.P. English obtained an arrest warrant from the Commonwealth of Virginia Magistrate Zachary R. Allentuck for **CHRISTOPHER SCOTT JONES**, date of birth: XX/XX/1980, for attempt to commit rape by having sexual intercourse with E.M. a child less than 13 years of age. JCCPD arrested **JONES** on July 15, 2022. Upon **JONES**’ arrest, JCCPD Investigator English seized one Apple iPhone13 cell phone on **JONES**’ person. At that time, JCCPD Investigator English learned **JONES** factory reset said iPhone. JCCPD Investigator English asked **JONES** if he factory reset his phone in which **JONES** replied with a smirk.

19. On July 16, 2022, JCCPD Investigator L.P. English submitted preservation requests to Meta for Instagram accounts “GHOSTFLAME80” and “emilymangumm” and Facebook account “Christopher.s.jones.58”, all associated with **JONES**.

20. On July 20, 2022, JCCPD Investigator G.R. Bellas obtained a search warrant from the Commonwealth of Virginia Magistrate Heather D. Farr authorizing the seizure of any and all electronic communication devices from the residence located at XXX Quarter Trail, Apartment X, Newport News, Virginia 23608. On July 21, 2022, JCCPD seized one Apple iPad Serial Number: DLXY87EWKC51 COMP and one Apple iWatch Serial Number: TH7Y30X4KDTC COMP from the residence located at XXX Quarter Trail, Apartment X, Newport News, Virginia 23608

21. On July 22, 2022, **JONES** was released on bond.

22. On July 26, 2022, JCCPD met with FBI Agents and turned over the investigation, to include all SUBJECT DEVICES, and other evidence obtained from the investigation to the FBI Peninsula Resident Agency.

23. On August 15, 2022, your affiant swore out a search warrant in the Eastern District of Virginia for the aforementioned electronic devices seized by JCCPD (see paragraph 20). A brief review of the said electronics confirmed the Apple 13 iPhone was factory reset.

24. On August 23, 2022, data from the electronic devices was extracted.

25. On October 20, 2022, your affiant received subscriber information in response to a Grand Jury subpoena served on September 12, 2022, for accounts associated with **CHRISTOPHER SCOTT JONES**, DOB: XX/XX/1980 and telephone number 757-561-XXXX. The information revealed cscottjones1980@gmail.com was associated with an active Apple ID iCloud account subscribed to **JONES**.

26. On January 5, 2023, your affiant reviewed the data obtained from the Apple iPad Serial Number: DLXY87EWKC51 COMP seized from **JONES** residence (see paragraph 20) and identified the following messages between **JONES** and a JUVENILE, believed to be a 16-year-old girl known to **JONES**:

- a. 5/13/2022, 9:21:39AM
 - i. **JONES**: You will be 17 in November. [...]
- b. 5/21/2022, 9:56:37AM – 10:20:20AM
 - i. JUVENILE: U tryna let me get my nails done *emojis*
 - ii. **JONES**: When? Today?
 - iii. JUVENILE: Uhh yea
 - iv. **JONES**: I do that and all 3 of y'all gonna want to. How much is that gonna be?
 - v. JUVENILE: [Suspected minor] can't get hers done cuz basketball
 - vi. JUVENILE: Last time me and [suspected minor] got ours done it was bout 93 I think I don't remember
 - vii. **JONES**: What am I getting?
 - viii. JUVENILE: Hmm whatever u want
 - ix. **JONES**: Whatever I want huh?
 - x. JUVENILE: Mhm
 - xi. **JONES**: Hmmm
 - xii. JUVENILE: I'll give you time to think
 - xiii. **JONES**: Come take care of this morning excitement
 - xiv. **JONES**: Lol
 - xv. JUVENILE: Imagine *emoji*
 - xvi. **JONES**: Oh I am
 - xvii. JUVENILE: How did that happen
 - xviii. **JONES**: It's every morning
 - xix. JUVENILE: Interesting
 - xx. **JONES**: It is
 - xxi. JUVENILE: Hmm
 - xxii. JUVENILE: Now if we were by ourselves I could do so much rn but that's kinda hard
 - xxiii. **JONES**: It's more than hard!! Lol
 - xxiv. **JONES**: I know
 - xxv. JUVENILE: Best I could do is send u some shower pics later or sum idk
 - xxvi. **JONES**: Lol
 - xxvii. JUVENILE: Wht
 - xxviii. **JONES**: It's all good. I was curious to see how adventurous you were

- xxix. JUVENILE: I'm adventurous it's jus our surroundings we gotta watch for
- c. 6/8/2022, – 5:31:04PM – 5:55:54PM
- i. JUVENILE: Wyd
 - ii. JONES: Shower
 - iii. JUVENILE: No invite *emoji*
 - iv. JONES: Oh you can come on anytime
 - v. JUVENILE: Kk
 - vi. JUVENILE: Wyd after
 - vii. JONES: You don't even have to ask
 - viii. JONES: Probably pick up [minor]
 - ix. JUVENILE: Oh ok
 - x. JONES: Video sent
 - xi. JUVENILE: *emojis*
 - xii. JUVENILE: Gave me a good smile
 - xiii. JONES: I was hoping so
 - xiv. JUVENILE: *emoji*
 - xv. JONES: Image sent
 - xvi. JUVENILE: Okayyy
 - xvii. JONES: You home alone tomorrow?
 - xviii. JUVENILE: Yup
 - xix. JUVENILE: Y
 - xx. JONES: Well you know I have this mattress that has to come over there.....
 - xxi. JUVENILE: Okayyyyyyy.....
 - xxii. JONES: Maybe I'll spend a little extra time there or something
 - xxiii. JUVENILE: Sounds good to me
 - xxiv. JUVENILE: Kinda wish I wasn't so far along
 - xxv. JONES: Why is that?
 - xxvi. JUVENILE: *emoji*
 - xxvii. JONES: I want you to say it
 - xxviii. JUVENILE: Cuz I can't have sex the way I want it
 - xxix. JONES: True but you still can get some pleasure right?
 - xxx. JUVENILE: Yea but not the best pleasure out of the whole process
 - xxxi. JONES: Well he must not be doing it right
 - xxxii. JUVENILE: Iggg
 - xxxiii. JONES: Well I guess we will see tomorrow if your up for it
 - xxxiv. JUVENILE: Yeaaa
 - xxxv. JONES: You know you still haven't show me your other talent you brag about.
 - xxxvi. JONES: Lol
 - xxxvii. JUVENILE: Ikk
 - xxxviii. JUVENILE: I've been going through a lot
- d. 6/12/2022, 1:32:56PM – 1:49:51PM

- i. JUVENILE: I'm hungry
 - ii. JONES: So am I
 - iii. JUVENILE: I'm open
 - iv. JONES: Ooooooooooooo.....so am I
 - v. JUVENILE: *emoji*
 - vi. JONES: Naughty naughty
 - vii. JUVENILE: *emoji*
 - viii. JONES: I so would if you were home alone and I was off
 - ix. JUVENILE: Ikk
 - x. JONES: I kinda figured you weren't in the mood the other day
 - xi. JUVENILE: I wasn't
- e. 7/11/2022, 11:08:11PM – 11:27:27PM
- i. JUVENILE: I'll give u 40 if u dance for me
 - ii. JONES: I'll give you \$50 if you dance for me
 - iii. JUVENILE: *emoji* say no more
 - iv. JONES: \$75 if you dance with nothing on
 - v. JONES: \$100 nothing on in person
 - vi. JUVENILE: Bett


27. On January 30, 2023, your affiant requested Department of Motor Vehicle records for **CHRISTOPHER SCOTT JONES**, date of birth: XX/XX/1980, social security number: XXX-XX-4206. The information obtained revealed the following address and vehicles registered to **JONES**: XXX Quarter Trail, Apartment X, Newport News, Virginia 23608; 2013 white Dodge Ram bearing Virginia license plate QSIREN, VIN: 3C63RRML9DG608586; and a 2016 Honda Sport Van bearing Virginia license plate MOSCVA, VIN: 5FNTL5H66GB057710.

28. On February 1, 2023, Special Agent Jeffrey Noel and Task Force Officer Heather Call conducted physical surveillance at XXX Quarter Trail, Apartment X, Newport News, Virginia 23608 and observed a Honda Odyssey Sport Van bearing Virginia license plate MOSCVA. As mentioned in paragraph 27, said vehicle is registered to **JONES**.

CONCLUSION

29. Based upon the facts set forth above, I submit that probable cause exists to believe **CHRISTOPHER SCOTT JONES**, has violated Title 18, United States Code, Section 2422(b). 18 U.S.C. § 2422(b) provides that whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title or imprisoned not less than 10 years or for life.

FURTHER YOUR AFFIANT SAYETH NOT.



Desirae E. Maldonado
Special Agent
FBI Child Exploitation Task Force
Federal Bureau of Investigation

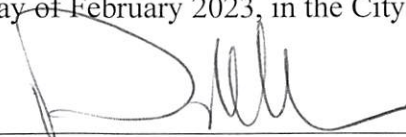
This affidavit has been reviewed for legal sufficiency by Assistant United States Attorney Peter G. Osyf.

Reviewed:



Peter Osyf
Assistant United States Attorney

Subscribed and sworn to before me this 2nd day of February 2023, in the City of Norfolk, Virginia.



The Honorable Douglas E. Miller
UNITED STATES MAGISTRATE JUDGE